BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY
(NPMHU/USPS-9)

The United States Postal Service files its responses to the above-listed

interrogatory of the National Postal Mail Handlers Union dated May 10, 2012. The

interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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NPMHU/USPS-9

Please provide a list of the eighty facilities referred to by Witness Marc Smith in lines 14-15 on page 7 of his Supplemental Testimony.
Columbus; Greensboro; Kansas City; Miami; Nashville; Oklahoma City; Orlando; Philadelphia; Pittsburgh; Richmond; Rochester; Tallahassee; and Westchester

RESPONSE

(It is assumed that the list of cities in the question is extraneous.)

See the list in USPS Library Reference N2012-1/NP28. It was generated on the basis of the February 23, 2012 AMP decisions and assumptions about future plans at that time. Since then, some assumptions have changed or have been overtaken by subsequent events, such as the decision announced on May 18, 2012 to implement facility consolidations in phases over the next two years (see Commission Information Request No. 1, Attachment to Question 1) in conjunction with the service standard changes reflected in USPS Library Reference N2012-1/99. Accordingly, it should be emphasized that USPS Library Reference N2012-1/NP28 does not reflects any final plans of the Postal Service regarding the facilities listed therein.